

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, DC 20268-0001

Institutional Cost Contribution Requirement
For Commercial Products

Docket No. RM 2012-3

**COMMENTS OF THE DIRECT MARKETING ASSOCIATION, INC.
IN SUPPORT OF THE PARCEL SHIPPERS ASSOCIATION MOTION
FOR CHANGES IN PROCEDURAL SCHEDULE**
(February 28, 2012)

While the Direct Marketing Association (DMA) accepts the rationale of the Postal Regulatory Commission as set forth in Order No. 1108, establishing Docket No. RM2012-3, we believe that the postal community at large would be best served by adopting the revised schedule presented in the motion of the Parcel Shippers Association (PSA).

We are in agreement with PSA that the imprecise nature of the statutory construction associated with the required review of the collective contribution level of competitive products provides the Commission with sufficient latitude to adopt the recommended changes in the procedural schedule. Moreover, we believe that PSA has made a cogent argument that a revised schedule will enable parties to provide more informed comments. With so many moving parts in the postal puzzle, ranging from the legislative arena to changes in underlying costs and cost coverages associated with network optimization, the Commission should proceed with caution in order to avoid ill-timed and potentially damaging conclusions in a number of dockets including not only this docket but also the 2011 Annual Compliance Determination.

Service of documents pertaining to this proceeding may be served on the undersigned.

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